

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Criminal Case No. 07CR2985-WQH
11 Plaintiff,)
12 v.) PROTECTIVE ORDER
13 EDUARDO BARAJAS (1),)
14 aka Eddie-Boy,)
15 VICTOR RAMOS (2),)
16 aka V,)
17 ALEJANDRO VELARDE (3),)
18 aka Lil' Al,)
19 MIGUEL RIVERA MEDINA (4))
20 aka Vampiro,)
21 JACOB TALLAECHE (5))
22 aka Dopey,)
23 THOMAS ALEJANDRO MANZANO (6),)
24 aka Tommy-Boy,)
25 DERIC WILLIAMS (7),)
26 aka Pelon,)
27 JULIO CESAR JIMENEZ (8),)
28 aka Foo-Foo,)
ERNESTO ROMAN LOPEZ (9),)
aka Ernie,)
Defendants.)

Upon joint motion of the parties, pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure pertaining to pretrial discovery, and to prevent premature and unwarranted disclosure of evidence to potential targets, subjects, witnesses, and unrelated third parties,

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1 IT IS HEREBY ORDERED that the defendants, their counsel of record, and their paralegals,
2 law clerks, secretaries, experts, investigators, assistants, office personnel and employees shall not
3 disclose the substance of any discovery material received from the Government in the
4 above-captioned matter, including all wiretap documents, to any third party, unless such material
5 is already a matter of public record, without prior approval of this Court;

6 IT IS FURTHER ORDERED that the United States Attorney and the Assistant United States
7 Attorneys assigned to this case (hereafter collectively referred to as "the Government") and their
8 assistants, the defendants, their counsel and their assistants, shall not disclose the substance of any
9 discovery material produced to the defendants or obtained by the Government from the defendants,
10 unless such material is already a matter of public record, to representatives of the media or other
11 third parties not involved in any way in the investigation or prosecution of the case;

12 Except that nothing contained herein shall prevent the Government, or any defendant or their
13 counsel, from disclosing such discovery material to any other attorneys working for the Government,
14 the defendants or their counsel, government agents (federal, state or local), paralegals, law clerks,
15 secretaries, experts, investigators, assistants, office personnel, employees , and any other person who
16 is working for the Government or the defendants and their counsel (collectively referred to as
17 "assistants") in the investigation or preparation of this case or, with respect to the Government and
18 its assistants only, in other criminal investigations, without prior court order;

19 Further, nothing contained herein shall preclude the Government, defendants or their
20 counsel, or their respective assistants from conducting an investigation of the facts of this case on
21 behalf of the Government or said defendants, or with respect to the Government and its assistants
22 only, from conducting an investigation of other criminal activity, including interviewing witnesses
23 disclosed by said discovery materials, or from taking statements from witnesses disclosed by said
24 discovery materials, or from asking said witnesses if they themselves have made prior statements
25 to the Government that are disclosed in the discovery materials, and about the contents of such
26 statements. In connection with any such investigation, it shall not be necessary that the Government,
27 the defendants or their counsel, or their respective assistants, obtain prior permission of this Court.

28 Should counsel withdraw or be disqualified from participation in this case, any material

1 received and any copies derived therefrom, shall be returned to the Government within ten (10) days.

2 Defense counsel and the Government shall be required to communicate the substance of this
3 order and explain it to their clients and assistants before disclosing the substance of the discovery
4 to their clients or assistants.

5 SO ORDERED.

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7 DATED: January 31, 2008

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9 **WILLIAM Q. HAYES**

10 United States District Judge

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